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13  
14 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 JOSEPH GIULIANO,

19 Defendant.

20 Case No. 2:14-cr-371-JCM-DJA

21 TWENTIETH STIPULATION TO  
22 CONTINUE SENTENCING

23 The United States of America, through Jason M. Frierson, United States Attorney, and  
24 Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by  
and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this  
Honorable Court to vacate the sentencing hearing set for Friday, May 5, 2023, at 10:00 a.m.  
and reset the sentencing proceedings in this matter at a date on or after August 1, 2023.

25 The parties make this stipulation and motion for good cause and not for the purposes of  
delay.

26 The possibility remains that defendant Giuliano may be called to testify in proceedings  
27 in a related case or assist in other matters pursuant to his plea agreement. The parties agree that

1 it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best  
2 interest to do so. The parties request this continuance of approximately 90 days to  
3 accommodate potential proceedings in another matter in which defendant Giuliano might be  
4 called upon to serve as a witness and any filings in this matter that may result.

5 Defendant Giuliano is not in custody and agrees to this continuance.

6 Denial of this request for continuance could result in a miscarriage of justice.

7 This is the twentieth request to continue sentencing in this matter.

8 The parties respectfully request this Honorable Court issue the attached proposed Order  
9 to accomplish these ends.

10 Dated May 1, 2023

11 Counsel for Defendant  
12 JOSEPH GIULIANO

JASON M. FRIERSON  
United States Attorney

13 //s// *Shawn R. Perez*  
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//s// *Daniel J Cowhig*  
DANIEL J. COWHIG  
Assistant United States Attorney

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4                   **UNITED STATES DISTRICT COURT**  
5                   **DISTRICT OF NEVADA**  
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6                   UNITED STATES OF AMERICA,  
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7                   Plaintiff,  
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8                   vs.  
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9                   JOSEPH GIULIANO,  
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10                  Defendant.

Case No. 2:14-cr-371-JCM-DJA

11  
12                   **ORDER**  
13

13                   **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

14                  Based on the stipulation of the parties and the record in these matters, the Court finds that the  
15                  parties make this stipulation and motion for good cause and not for the purposes of delay. The  
16                  possibility remains that defendant Giuliano may be called to testify in proceedings in a related  
17                  case or assist in other matters pursuant to his plea agreement. The parties agree that it is in the  
18                  interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do  
19                  so. The parties request this continuance of approximately 90 days to accommodate potential  
20                  proceedings in another matter in which defendant Giuliano might be called upon to serve as a  
21                  witness and any filings in this matter that may result. The parties agree that it is in the interest  
22                  of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do so.

23                  Defendant Giuliano is not in custody and agrees to this continuance.

24                  Denial of this request for continuance could result in a miscarriage of justice.

This is the twentieth request to continue sentencing in this matter.

## ORDER

**IT IS HEREBY ORDERED**, on the stipulation of the parties and good cause appearing therefor, that the sentencing hearing set for Friday, May 5, 2023, at 10:00 a.m. be vacated and reset for **August 2, 2023 at 10:30 a.m.** in Las Vegas Courtroom 6A.

**IT IS SO ORDERED** May 1, 2023.

*James C. Mahan*  
THE HONORABLE JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE